

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

Civil Action No. 98-1232 (TPJ)

STATE OF NEW YORK *ex rel.*

Attorney General DENNIS C. VACCO, *et al.*,

Plaintiffs,

v.

MICROSOFT CORPORATION,

Defendant.

Civil Action No. 98-1233 (TPJ)

**UNITED STATES' MOTION TO COMPEL
MICROSOFT CORPORATION TO COMPLY WITH DISCOVERY**

Pursuant to Rule 37 of the Federal Rules of Civil Procedure, the United States hereby moves the Court to compel Microsoft to comply with:

- 1) Plaintiffs' First Joint Request for Production of Documents (Request for Production No. 20);
- 2) Plaintiff United States' and Plaintiff States' Notice of Rule of 30 (b)(6) Deposition of Microsoft Corporation; and

- 3) Plaintiff United States' and Plaintiff States' Notice of Deposition of Microsoft Corporation.

This motion is made on the grounds that the document requests and deposition testimony sought are relevant to the subject matter of the action and do not relate to privileged matters, and the refusal to comply is without justification. This Motion is supported by the Memorandum and Declaration of Stephen D. Houck, filed herewith.

DATED: July 31, 1998

_____/s/_____
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Chief
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